

1 ISQUIERDA, by and through Counsel, DOROTHY SHELTON, and pursuant to Rule 15(a) of the
2 Federal Rules of Criminal Procedure, and pursuant to 18 U.S.C. Section 3144, move for an Order
3 to secure video depositions of their testimony pending trial, and for an Order for their release from
4 custody immediately thereafter.

5 This Motion will be made on the grounds that the Witnesses are unable to meet any condition
6 of release, and that their testimony can be adequately secured by Deposition, and that detention is not
7 necessary to prevent a failure of Justice, and that further detention imposes a severe hardship on the
8 Witnesses and their family.

9 This Motion will be based upon the Declaration of Attorney DOROTHY SHELTON, the
10 Memorandum of Points and Authorities in support of this Motion herein filed, and all documents and
11 records on file herein, and upon such oral testimony as the Court may deem proper.

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13 Dated: April 4, 2008

14 /s/ Dorothy Shelton
15 DOROTHY SHELTON
16 Attorney for GAUDENCIO BARRAGAN-MORALDS
17 SALVADOR ISQUIERDA-ISQUIERDA
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